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Attorneys for Defendant  
 JOHN KONTRABECKI

UNITED STATES DISTRICT COURT  
 NORTHERN DISTRICT OF CALIFORNIA

ARON M. OLINER, et al,  
  
 Plaintiffs,  
 v.

JOHN KONTRABECKI,  
  
 Defendant.

BK Adversary Proceeding No. 03-3264  
 DM

In re  
 CENTRAL EUROPEAN INDUSTRIAL  
 DEVELOPMENT COMPANY, LLC d/b/a  
 CEIDCO,  
  
 Debtor.

In re  
 THE KONTRABECKI GROUP LP,  
  
 Debtor.

Case No. 06-03787 CRB

**STIPULATED REQUEST FOR  
 EXTENSION OF BRIEFING SCHEDULE**

Date: December 8, 2006  
 Time: 10:00 a.m.  
 Courtroom: 8, 19<sup>th</sup> Floor  
 Judge: Hon. Charles R. Breyer

Bk. No. 02-30419-11-DM  
 Chapter 11

Bk. No. 02-30421-11-DM  
 Chapter 11  
 [Jointly Administered]

1 Plaintiff Lehman Brothers Holdings Inc. ("Lehman") and Defendant John Kontrabecki,  
2 through their undersigned counsel, hereby stipulate as follows:

3 1. On October 23, 2006, the Court granted a Stipulated Request re Briefing and  
4 Hearing Schedule and for Authority to File Over-Length Briefs on Motion for Withdrawal of  
5 Reference ("First Stipulated Order"), which established an agreed upon briefing and hearing  
6 schedule for Mr. Kontrabecki's Motion to Withdraw Reference of Adversary Proceeding  
7 ("Motion to Withdraw"), originally filed on June 6, 2006 and subsequently withdrawn.

8 2. The briefing and hearing schedule established in the First Stipulated Order was as  
9 follows:

10 a. Mr. Kontrabecki's revised opening papers were to be served by November  
11 3, 2006.

12 b. Lehman's opposition was to be served by November 17, 2006.

13 c. Mr. Kontrabecki's reply was to be served by November 27, 2006.

14 d. The hearing was to be held December 8, 2006, at 10:00 a.m.

15 3. Counsel for Mr. Kontrabecki asked Lehman's counsel to stipulate to a brief  
16 extension of the schedule set forth in the First Stipulated Order, largely because Mr.  
17 Kontrabecki's principal counsel has been in trial for most of the last two weeks in Humboldt  
18 County.

19 4. Subject to Court approval, the parties have agreed to modify the briefing schedule  
20 established in the First Stipulated Order as follows:

21 a. Mr. Kontrabecki's revised opening papers shall be served and filed by  
22 November 8, 2006.

23 b. Lehman's opposition shall be served and filed by November 22, 2006.

24 c. Mr. Kontrabecki's reply shall be served and filed by November 29, 2006.

25 d. The hearing shall still be held on December 8, 2006, at 10:00 a.m.

26 5. Notwithstanding the above agreed upon briefing and hearing schedule, Lehman  
27 reserves its right, after review of Mr. Kontrabecki's revised opening papers, to request more than  
28 14 days, but not to exceed 21 days, to serve and file its opposition. Should the Court grant

1 Lehman's requested extension, which extension Mr. Kontrabecki will not oppose, Mr.  
2 Kontrabecki shall serve and file his reply within 7 days of the date Lehman's opposition is served  
3 and filed, and the hearing shall be held on December 15, 2006, at 10:00 a.m.

4  
5 Dated: November 3, 2006

FARELLA BRAUN & MARTEL LLP  
ALLEN MATKINS LECK GAMBLE MALLORY  
& NATSIS LLP

7 By: /s/ Tyler C. Gerking

8 Tyler C. Gerking  
9 Attorneys for John Kontrabecki

10 Dated: November 3, 2006

HELLER EHRMAN LLP  
McKENNA LONG & ALDRIDGE LLP

12 By: /s/ Mark S. Kaufman

13 Mark S. Kaufman  
14 Attorneys for Lehman Brothers Holdings, Inc.

15  
16 **ORDER**

17 IT IS SO ORDERED.

18 Dated: Novmeber 6, 2006.

